

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

CRYSTALLEX INTERNATIONAL CORP.,)	
)	
Plaintiff,)	
)	
v.)	Misc. No. 17-151-LPS
)	
BOLIVARIAN REPUBLIC OF)	
VENEZUELA,)	
)	
Defendant.)	

**NOTICE OF FILING OF
CERTAIN BID MATERIALS RECEIVED BY SPECIAL MASTER**

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Counsel for Special Master Robert B. Pincus

Dated: August 29, 2025
12444865 / 21202.00001

PLEASE TAKE NOTICE THAT, pursuant to the *Scheduling Order* (D.I. 2110), the Special Master¹ hereby files certain bid materials received by the Special Master (i) on August 22, 2025, from Bidder C that submitted an Unsolicited Competing Proposal; and (ii) on August 28, 2025, from Dalinar Energy Corporation (“**Dalinar**”) in connection with its match right pursuant to section 6.1(d) of the Dalinar SPA (as defined in the Recommendation) following the Special Master’s notification of receipt of a Superior Proposal on August 25, 2025 (D.I. 2113) (such materials, collectively, the “**Bid Materials**”).² The Special Master separately filed the final bid letter and other bid materials submitted by Amber Merger Sub LLC (“**Amber**”), a wholly-owned subsidiary of Amber Energy Inc., an affiliate of Elliott Investment Management L.P., as exhibits to the *Special Master’s Updated Final Recommendation* filed concurrently herewith (the “**Recommendation**”). The Bid Materials submitted by Dalinar, including its revised bid letter, an equity commitment letter with Valores Mundiales, S.L. and Consorcio Andino, S.L., an offer letter to Contrarian Capital Management, L.L.C., and a redline to the Dalinar SPA proposing amendments, are attached hereto as **Exhibit A**. The Bid Materials submitted by Bidder C, including its bid letter and proposed stock purchase agreement, are attached hereto as **Exhibit B**. The Bid Materials attached hereto contain minimal redactions intended to preserve the

¹ All capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the *Sixth Revised Proposed Order (A) Establishing Sale and Bidding Procedures, (B) Approving Special Master’s Report and Recommendation Regarding Proposed Sale Procedures Order, (C) Affirming Retention of Evercore as Investment Banker by Special Master and (D) Regarding Related Matters* (D.I. 481) (the “**Sale Procedures Order**”) and in the Recommendation (as defined herein), as applicable.

² The Bid Materials attached hereto do not include the financing commitment letters submitted by the applicable bidders, if any.

confidentiality of Bidder C's identity and any other sensitive information.³ See *Memorandum Order Regarding Sale Process and Litigation* dated December 31, 2024 (D.I. 1517) ¶ 23.

Respectfully submitted,

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By: /s/ Myron T. Steele

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Counsel for Special Master Robert B. Pincus

³ The identity of Dalinar is public in connection with its bid previously recommended by the Special Master.